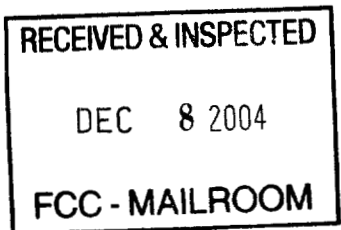




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ORIGINAL

December 6, 2004

Commissioner Jonathan S. Adelstein
Federal Communications Commission
The Portals
445 12th Street, SW, Room 8-C302
Washington, DC 20554

Re: Access to Unbundled Network Elements, WC Docket No. 03-225

Dear Commissioner Adelstein:

As president of the Arizona Payphone Association, I am writing to urge you to take action on the pending revision of the Unbundled Network Element (UNE) rules. This is necessary to ensure that payphone providers continue to have competitive alternatives for their local service needs.

Pay telephones play a critical role in meeting the needs of the public for communications, especially in emergencies and in disasters such as 9/11. For many citizens, payphones are the only form of telecommunications available to them on a regular basis. It is for these reasons that Congress mandated widespread availability of pay telephone service in the Telecommunications Act. The single largest monthly cost incurred by payphone providers in deploying and maintaining a payphone for public use is the charge paid for local telephone service. In order to continue providing payphones, our members must have reliable local service connections at a reasonable cost. Today, our members rely on the availability of competitive telephone company alternatives for local service. Without competitive local service options like UNE-P, there is no market check on what payphone providers may be charged by the incumbent telephone company, who also is frequently their competitor in the payphone business.

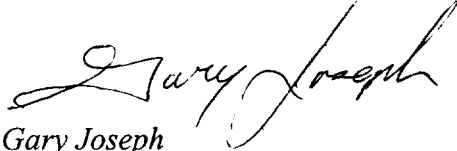
For pay telephone providers, the only competitive alternative that has proven effective to date is UNE-P. Payphones generally do not transmit data and do not need broadband channels; thus, broadband facilities do not provide a viable competitive alternative for payphones. In the last few years, our members have had to remove a large number of their payphones from service because their revenue was insufficient to meet operating costs. The reality is that, without UNE-P, more of the payphones that the American public rely on and need will be removed from service.

*Commissioner Jonathan S. Adelstein
December 6, 2004
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Therefore, on behalf of the Arizona Payphone Association, I urge you to take the necessary steps to ensure that the FCC's revised UNE rules preserve competitive local service alternatives for payphones. Thank you for your consideration.

Respectfully,

ARIZONA PAYPHONE ASSOCIATION

A handwritten signature in cursive script that reads "Gary Joseph".

*Gary Joseph
President*

GJ:dc

*cc: Senator Jon L. Kyle
Senator John McCain
Representative Ed Pastor
Representative Rick Renzi
Representative John B. Shadegg
Representative J.D. Hayworth
Representative Jeff Flake
Representative Raul M. Grijalva
Representative Jim Kolbe
Representative Trent Franks*